

DISCOVERY PLAN WORKSHEET
Tier 1 Pre-Settlement Discovery

Deadline for Completion of Rule 26(a) initial disclosures
and HIPAA-compliant records authorizations: May 26, 2017

Completion date for Phase 1 Discovery
as agreed upon by the parties June 12, 2017
*(Reciprocal and agreed upon document production
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference).*

Status Conference TBD by the Court: _____
(Generally 15 days post Tier 1 Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: July 27, 2017
(Presumptively 15 days post status conference)

First requests for production of documents
and for interrogatories due by: August 14, 2017
(Presumptively 15 days post joining/amending)

All fact discovery completed by: December 1, 2017
*(Presumptively 3.5 months post first
requests for documents/interrogatories)*

Exchange of expert reports completed by: January 2, 2018
(Presumptively 30 days post fact discovery)

Expert depositions completed by: February 2, 2018
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: March 6, 2018
*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

COMPLETION OF ALL DISCOVERY BY: February 12, 2018
(Note: Presumptively 9 months after Initial Conference).

Submission of joint pretrial order: _____

Final Pretrial Conference TBD by the court: _____